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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20541

In the Matter of

Amendment of Section 73.622(b),
Table of Allotments,
Digital Television Broadcast Stations.
(Bryan, Texas)

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MM Docket No. 00-124
RM-9893

To: Chief, Video Services Division

COMMENTS OF CENTEX TELEVISION LIMITED PARTNERSHIP

Centex Television Limited Partnership ("Centex") hereby submits its comments in response to the Notice of Proposed Rule Making ("NPRM") in the above-captioned matter, released July 13, 2000. This NPRM responds to a Petition for Rule Making submitted by KWTX/KBTX Licensee Corporation, licensee of KBTX-TV, Bryan, Texas, which seeks to substitute Channel 33 at Bryan, Texas in the DTV Table of Allotments for KBTX-DT's current DTV allotment of Channel 59. Centex is the licensee of low power television station KRHD-LP, Bryan, Texas, Channel 34, which has been granted a Certificate of Eligibility for Class A television status by the Commission. As detailed below, Centex objects to the requested modification of the Digital Table of Allotments and urges the Commission to deny the proposed substitution on the grounds that it is not in the public interest.

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DISCUSSION

First and foremost, operation of KBTX-DT from Channel 33 as proposed in the NPRM will cause harmful interference to KRHD-LP, in violation of the Commission's rules. As demonstrated in the attached engineering exhibit prepared on behalf of KRHD-LP, if KBTX is permitted to substitute Channel 33 in the DTV Table of Allotments and operate KBTX-DT with the facilities proposed in the NPRM it will result in a prohibited overlap of KRHD-LP's protected contour and cause interference to the protected service area of KRHD-LP. Pursuant to the Commission's rules, KRHD-LP is protected from interference within its 74 dBu contour from the time it filed an acceptable Certificate of Class A Eligibility.¹ Centex filed a Certificate of Eligibility for Class A status for KRHD-LP on January 28, 2000. The Certificate was subsequently granted by the Commission by Public Notice, DA 00-1224, released June 2, 2000.

Although Section (f)(1)(D) of the Community Broadcasters Protection Act gives full-service stations the flexibility to make adjustments to the DTV Table of Allotments,² such

¹ See 47 C.F.R. § 73.6010; In Re the Matter of Establishment of a Class A Television Service, Report and Order, MM Docket No. 00-10, FCC 00-115, released April 4, 2000, ¶¶ 40-41 ("Class A Report and Order").

² Section (f)(1)(D) states:

(D) Resolution of Technical Problems. - The Commission shall act to preserve the service areas of low-power television licensees pending the final resolution of a class A application. If, after granting certification of eligibility for a class A license, technical problems arise requiring an engineering solution to a full-power station's allotted parameters or channel assignment in the digital television Table of Allotments, the Commission shall make such modifications as necessary--

(i) to ensure replication of the full-power digital television applicant's service area, as provided for in §§73.622 and 73.623 of the Commission's regulations (47 CFR 73.622, 73.623); and

(ii) to permit maximization of a full-power digital television applicant's service area consistent with such §§73.622 and 73.623, if such applicant has filed an application for maximization or a notice of its intent to seek such maximization by December 31, 1999, and filed a bona fide application for maximization by May 1, 2000. Any such

Footnote continued on next page

requests must ensure the protection of Class A facilities except where the full power station is seeking to resolve technical problems associated with DTV replication or so as to maximize its facilities.³ The instant modification proposed by KBTX does not seek maximization of KBTX-DT's facilities, nor is the proposed substitution necessary to replicate the service area of KBTX-TV. Similarly, KBTX's Petition for Rulemaking makes no mention of technical problems associated with maximization or replication. Indeed, as shown below and in the attached engineering exhibit, the proposed modification will actually result in the *loss* of service to the public. Therefore, it is clearly not an attempt to maximize KBTX-DT's facilities. A licensee such as KBTX seeking an adjustment to the DTV Table of Allotments that is *not* necessitated by unforeseen technical problems must afford protection to the service area of Class A LPTV stations, something KBTX has not done in the instant situation.

Second, operations of KBTX-DT on Channel 33 would result in a substantial reduction in digital service to the public in comparison with operations on its current DTV allotment of Channel 59. As demonstrated in the attached engineering exhibit, operation of KBTX-DT on Channel 59 as allocated by the Commission would provide digital service to 2.45 million people in the area around Bryan, Texas. Pursuant to the construction permit that KBTX has obtained for digital operations on Channel 59 the station would reach an estimated 2.21 million people. However, operation of KBTX-DT on Channel 33 as proposed in the NPRM would permit the station to reach only 1.80 million people. Therefore, substitution of Channel 33 for the current

Footnote continued from previous page

applicant shall comply with all applicable Commission rules regarding the construction of digital television facilities.

47 U.S.C. 336(f)(1)(D).

³ Class A Report and Order at ¶¶ 61-64.

Channel 59 is not in the public interest, as it will result in digital service to approximately a million *fewer* people than KBTX-DT's current DTV allotment. As the Commission has consistently held, "[i]t is an undisputed principle that the loss of service... is *prima facie* against the public interest, absent a substantial showing of offsetting factors."⁴ In the instant situation, KBTX has demonstrated no such factors that would outweigh the substantial loss of digital service that it has proposed.

Third, as shown in the attached engineering, KBTX's proposed operations on Channel 33 will create interference to the digital facilities of KVUE(TV), Austin, Texas. Specifically, KBTX-DT's proposed maximized facilities operating on Channel 33 would cause new interference to 2.9% of the population served by KVUE-DT. In addition, allowing KBTX-DT to substitute Channel 33 for its digital operations would preclude the grant of KVUE-DT's maximization application, thereby precluding DTV service to 350,247 persons. KBTX has failed to analyze or address this interference problem in its Petition for Rulemaking. Pursuant to Section 73.623(c) of the Commission's rules, proposals seeking to amend the DTV Table of Allotments must demonstrate that the requested change will not result in more than an additional 2 percent of the population served by another station being subject to interference.⁵ KBTX's proposal exceeds that 2 percent threshold and should therefore be denied.

⁴ KTVO, Inc., 44 Fed. Reg. 60818, FCC 79-607, released October 22, 1979, at ¶13; *see also Coronado Communications*, 8 FCC Rcd 159, at ¶ 12 (VSD 1992); Hall v. Federal Communications Commission, 237 F.2d 567 (D.C. Cir. 1956).


⁵ 47 C.F.R. 73.623(c).

CONCLUSION

As the KBTX requested channel substitution would create predicted interference to KRHD-LP, and as the proposal would serve fewer people than would the station from its current channel, and would create interference to another station, the proposed channel change is not in the public interest. Thus, Centex submits that the modification of the DTV Table of Allotments sought by KBTX must be denied.

Respectfully submitted,

CENTEX TELEVISION LIMITED PARTNERSHIP

By: 
David D. Oxenford
Brendan Holland

Its Attorneys

SHAW PITTMAN
2300 N Street, N.W.
Washington, D.C. 20037
(202) 663-8000

Dated: September 5, 2000

FCCCOMM39895.0006

Document #: 987043 v.2

ENGINEERING STATEMENT IN

SUPPORT OF COMMENTS

MM DOCKET 00-124

KBTX-DT - BRYAN, TX

**Centex Television Limited Partnership
Bryan, TX**

September 5, 2000

**Prepared for: Mr. Jeff Cook
Centex Television Limited
Partnership
P.O. Box 2522
Waco, TX 76711**

CARL E. SMITH CONSULTING ENGINEERS

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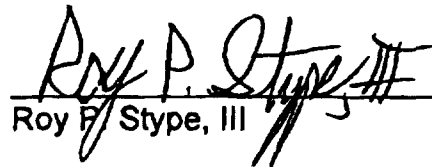
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(Channel 33 Rulemaking Facilities)

ENGINEERING AFFIDAVIT

State of Ohio)
) ss:
County of Summit)


Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by the Centex Television Limited Partnership to prepare the attached "Engineering Statement in Support of Comments - MM Docket 00-124 - KBTX-DT - Bryan, TX."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.



Roy P. Stype, III

Subscribed and sworn to before me on September 5, 2000.



Notary Public

NANCY A. FERRINI, Notary Public
Residence - Cuyahoga County
State Wide Jurisdiction, Ohio
My Commission Expires March 13, 2005

A.K.A Nancy A. Adam

/SEAL/

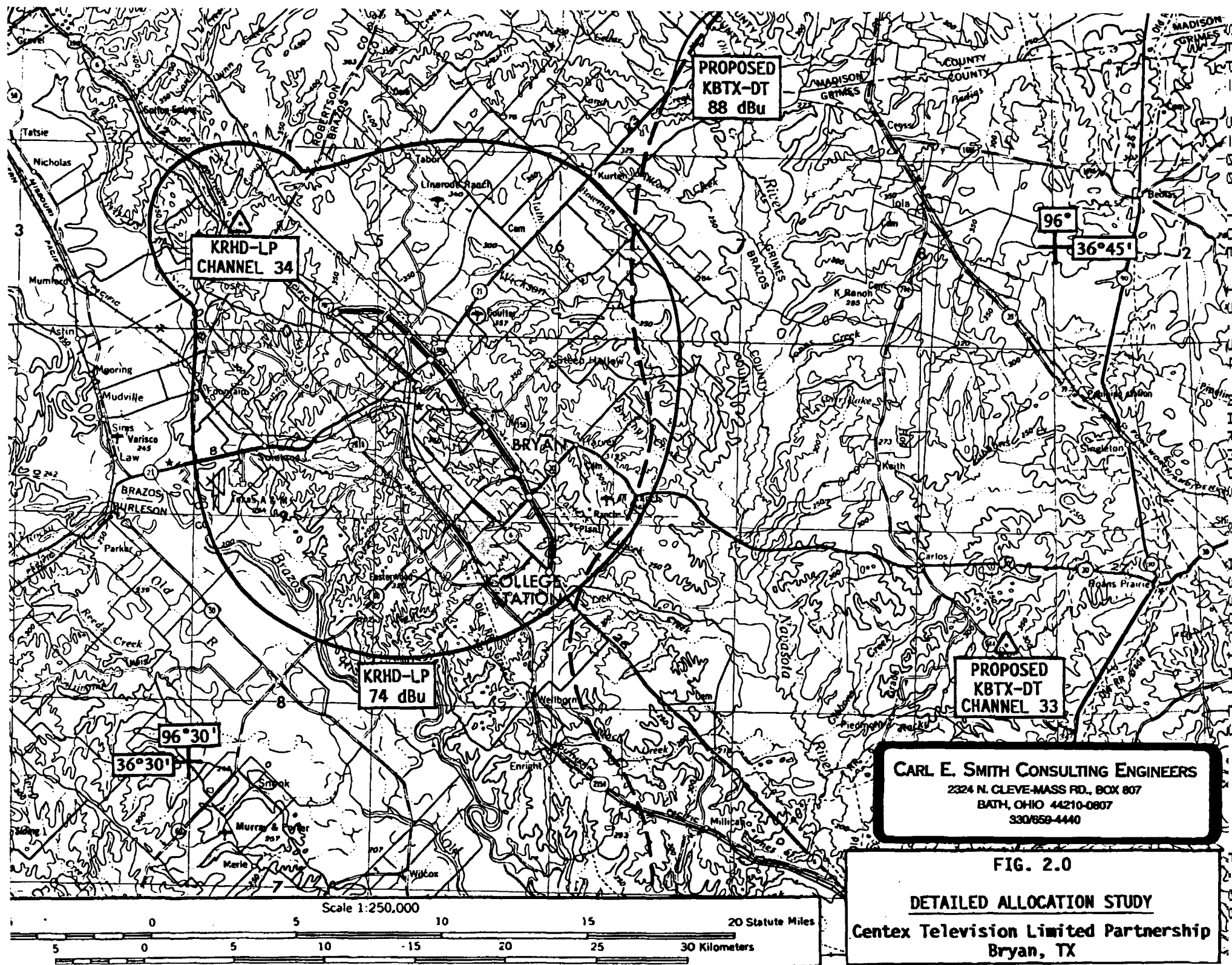
ENGINEERING STATEMENT

1.0 GENERAL

This engineering statement is prepared on behalf of the Centex Television Limited Partnership, licensee of KRHD-LP - Bryan, Texas. KRHD-LP operates as an analog LPTV facility on Channel 34 with a maximum effective radiated power of 76.0 kilowatts. KRHD-LP has been granted a Certificate of Eligibility for Class A status and has filed a license application, on FCC Form 302-CA, to convert its present LPTV license to a Class A TV license. The Notice of Proposed Rulemaking in MM Docket 00-124 has proposed to substitute DTV Channel 33 for DTV Channel 59 in Bryan, Texas for use by KBTX-DT. This engineering statement is prepared in support of comments in this DTV rulemaking proceeding and documents that the proposed Channel 33 DTV facilities would not provide the necessary protection to KRHD-LP as a Class A facility and that the proposed channel substitution would otherwise not serve the public interest.

2.0 PROTECTION OF KRHD-LP AS A CLASS A FACILITY

Section 73.623(c)(5) of the FCC Rules outlines the applicable protection criteria for a Class A TV station (or a Class A eligible LPTV station) from a DTV broadcast station. In this situation, this rule section prohibits any overlap between the proposed KBTX-DT 88 dBu F(50,10) contour and the KRHD-LP 74 dBu F(50,50) contour. Figure 2.0 is a map exhibit depicting the appropriate contours for KRHD-LP and the proposed KBTX-DT Channel 33 facilities. As shown in this figure, the proposed KBTX-DT 88 dBu contour will overlap the KRHD-LP 74 dBu contour. Thus the proposed KBTX-DT Channel 33 DTV facilities fail to provide the required protection to KRHD-LP as a Class A facility.



3.0 CONFLICT WITH KVUE-DT MAXIMIZATION APPLICATION

Studies were conducted utilizing the procedures outlined in FCC OET Bulletin 69 to evaluate the predicted increase in interference to other facilities, both NTSC and DTV, requiring protection consideration from the Channel 33 DTV facilities proposed in the KBTX-DT rulemaking petition. These interference studies were conducted utilizing the FCC's "FLR" computer program modified to run on a Windows 98/Windows NT platform and recompiled under the Compaq (DEC) Visual Fortran compiler. The version of the "FLR" program utilized in conducting these studies employed the same 2 kilometer cell size as was employed by the FCC in conducting the initial DTV allotment studies. This implementation of the "FLR" program was run for several stations utilizing the databases employed by the FCC to generate the benchmark values contained in Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders and yielded results essentially identical to those found in Appendix B for these stations. Thus, it is felt that this implementation of the "FLR" program faithfully reproduces the results obtained by the FCC in their implementation of this program.

These interference studies were conducted on all NTSC and DTV facilities for which the proposed KBTX-DT site is located within the distances outlined in Table 7 of OET Bulletin 69 of the Grade B or Noise Limited contour. For NTSC stations holding a construction permit, the construction permit facilities were studied, as outlined in the FCC's August 10, 1998 Public Notice outlining the procedures to be employed in conducting this sort of interference studies. The licensed facilities were studied for NTSC facilities not holding a construction permit. The allotment facilities were studied for all DTV facilities. Further studies were also conducted to the proposed or authorized facil-

ities of DTV stations whose application or authorization specifies facilities exceeding those authorized by their DTV allotment (non-checklist facilities).

In conducting these interference studies, interfering NTSC stations holding a construction permit were considered to be operating with their construction permit facilities, while interfering NTSC stations not holding a construction permit were considered to be operating with their licensed facilities. Interfering DTV facilities who have not yet filed a construction permit application and authorized or proposed interfering DTV facilities which are based on a checklist application were considered to be operating with their DTV allotment facilities. For interfering DTV facilities which have a pending maximization application or have been authorized operating facilities based on a maximization application, the maximized facilities were considered in these studies only if they reduced the DTV Service or NTSC Service population for the station being studied below the value which occurs when the same station's DTV allotment facilities are considered.

Table 3.0 presents the results of these studies for the Channel 33 DTV allotment facilities of KVUE-DT - Austin, Texas. Similarly, Table 3.1 presents the results of these studies for the facilities proposed in KVUE-DT's Channel 33 DTV maximization application (BPCDT-19991025ADW). These tables contain a complete listing of the stations which were included in each study and the facilities which were considered for each station included in the study. They also contain the output of the "FLR" program for the station being studied for both with and without the Channel 33 DTV facilities proposed in the KBTX-DT rulemaking petition. As shown in Table 3.0, the proposed KBTX-DT Channel 33 DTV rulemaking facilities would increase the percent loss for the KVUE-DT allotment facilities by 1.0%, from 0.4% to 1.4%. Thus, these proposed facilities comply with the 2%/10% de minimis interference criteria outlined in Section 73.623(a) of the

FCC Rules with regard to the KVUE-DT allotment facilities. Table 3.1, however, shows that the proposed KBTX-DT Channel 33 DTV rulemaking facilities would result in new interference of 2.9% to the facilities proposed in the KVUE-DT maximization application, in direct violation of the 2%/10% de minimis interference criteria outlined in Section 73.623(a) of the FCC Rules.

Based on the above information, the proposed Channel 33 DTV facilities proposed in the KBTX-DT rulemaking petition fail to provide the required protection to the facilities proposed in the KVUE-DT maximization application. As a result, these two proposals should be considered to be mutually exclusive, permitting only one of them to be granted.

TABLE 3.0

OET 69 INTERFERENCE STUDIES
 KVUE-DT - AUSTIN, TX
(ALLOTMENT FACILITIES)
 Centex Television Limited Partnership
 Bryan, TX

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KVUE-DT	Austin, TX	33	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KDAF	Dallas, TX	33	NTSC	CP	BPCT19980909KF
KCTF	Waco, TX	34	NTSC	CP	BPET-19990216KF
KITU-DT	Beaumont, TX	33	DTV	Application	BPEDT-19991029AGB
KRRT-DT	Kerrville, TX	32	DTV	Application	BPCDT-19991029ACH
KBTX-DT	Bryan, TX	33	DTV	Applicant	BPRM-20000328ABS

STUDY RESULTS WITHOUT KBTX-DT RULEMAKING FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	999242	22940.9
not affected by terrain losses	996440	22579.8
lost to NTSC IX	393	68.2
lost to additional IX by ATV	3242	232.7
lost to ATV IX only	3242	232.7
lost to all IX	3635	300.9

STUDY RESULTS WITH KBTX-DT RULEMAKING FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	999242	22940.9
not affected by terrain losses	996440	22579.8
lost to NTSC IX	393	68.2
lost to additional IX by ATV	13337	1235.7
lost to ATV IX only	13416	1263.8
lost to all IX	13730	1303.9

TABLE 3.0 (cont'd)

OET 69 INTERFERENCE STUDIES
KVUE-DT - AUSTIN, TX
(ALLOTMENT FACILITIES)

SUMMARY OF STUDY RESULTS

	Without KBTX-DT <u>Rulemaking</u>	With KBTX-DT <u>Rulemaking</u>	<u>Increase/(Decrease)</u>
DTV Service	992,805	982,710	(10,095)
Percent Loss(Gain)*	0.4%	1.4%	1.0%

*Percent Loss calculations are based on the benchmark DTV Service value of 997,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

TABLE 3.1

OET 69 INTERFERENCE STUDIES
KVUE-DT - AUSTIN, TX
(APPLICATION FACILITIES)
Centex Television Limited Partnership
Bryan, TX

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KVUE-DT	Austin, TX	33	DTV	Application	BPCDT-19991025ADW

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KDAF	Dallas, TX	33	NTSC	CP	BPCT19980909KF
KCTF	Waco, TX	34	NTSC	CP	BPET-19990216KF
KITU-DT	Beaumont, TX	33	DTV	Application	BPEDT-19991029AGB
KRRT-DT	Kerrville, TX	32	DTV	Application	BPCDT-19991029ACH
KVCT-DT	Victoria, TX	34	DTV	Application	BPCDT-19991027ACU
KBTX-DT	Bryan, TX	33	DTV	Applicant	BPRM-20000328ABS

STUDY RESULTS WITHOUT KBTX-DT RULEMAKING FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	1458179	35873.0
not affected by terrain losses	1408431	35122.7
lost to NTSC IX	2691	168.5
lost to additional IX by ATV	62688	810.5
lost to ATV IX only	62709	814.5
lost to all IX	65379	979.0

STUDY RESULTS WITH KBTX-DT RULEMAKING FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	1458179	35873.0
not affected by terrain losses	1408431	35122.7
lost to NTSC IX	2691	168.5
lost to additional IX by ATV	91925	3173.6
lost to ATV IX only	92303	3249.9
lost to all IX	94616	3342.2

TABLE 3.1 (cont'd)

OET 69 INTERFERENCE STUDIES
KVUE-DT - AUSTIN, TX
(APPLICATION FACILITIES)

SUMMARY OF STUDY RESULTS

	Without KBTX-DT <u>Rulemaking</u>	With KBTX-DT <u>Rulemaking</u>	<u>Increase/(Decrease)</u>
DTV Service	1,343,052	1,313,815	(29,237)
Percent Loss(Gain)*	(34.7)%	(31.8)%	2.9%

*Percent Loss calculations are based on the benchmark DTV Service value of 997,000 from Appendix B of the December 18, 1998 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268.

4.0 KBTX-DT RULEMAKING PROPOSAL WILL REDUCE DTV SERVICE

Studies were also conducted utilizing the procedures outlined in OET Bulletin 69 to evaluate the predicted DTV Service for the Channel 33 DTV facilities proposed in the KBTX-DT rulemaking petition and also for the present KBTX-DT Channel 59 allotment facilities and the Channel 59 DTV facilities authorized by the KBTX-DT construction permit (BPCDT-19991026ACP). These studies were conducted in the same manner as described in Section 3.0 of this engineering statement, except that the allotment facilities were considered for all potentially interfering DTV stations, to insure that the results were not influenced by additional interference from DTV maximization applications which have not yet been granted.

Table 4.0 presents the results of these studies for the KBTX-DT Channel 59 DTV allotment facilities. Similarly, Table 4.1 presents the results of these studies for the KBTX-DT Channel 59 construction permit facilities. Finally, Table 4.2 presents the results of these studies for the Channel 33 DTV facilities proposed in the KBTX-DT rulemaking petition. As shown in these tables, the proposed Channel 33 DTV facilities would provide DTV service to a population 649,792 (26.5%) smaller than that for the present Channel 59 DTV allotment facilities and 411,671 (18.6%) smaller than that for the facilities authorized by the KBTX-DT Channel 59 construction permit. Additionally, as outlined in Section 3.0 of this engineering statement, the grant of the KBTX-DT rulemaking proposal would preclude the grant of the KVUE-DT maximization application, precluding potential DTV service to another 350,247 persons. Thus, the grant of the KBTX-DT rulemaking proposal would eliminate potential DTV service to over 750,000 persons when compared with the present Channel 59 construction permit facilities and in excess of 1,000,000 persons when compared to the present Channel 59 DTV allot-

ment facilities. Such a reduction in DTV service cannot be considered to serve the public interest.

TABLE 4.0

OET 69 INTERFERENCE STUDIES
 KBTX-DT - BRYAN, TX
(CHANNEL 59 ALLOTMENT FACILITIES)
 Centex Television Limited Partnership
 Bryan, TX

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KBTX-DT	Bryan, TX	59	DTV	Allotment	

STATIONS CONSIDERED IN STUDIES

No interfering stations require consideration in these studies

STUDY RESULTS

	POPULATION	AREA (sq km)
within Noise Limited Contour	2455369	39062.4
not affected by terrain losses	2454414	38938.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
DTV Service	2454414	38938.3

TABLE 4.1

OET 69 INTERFERENCE STUDIES
 KBTX-DT - BRYAN, TX
(CHANNEL 59 CONSTRUCTION PERMIT FACILITIES)
 Centex Television Limited Partnership
 Bryan, TX

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KBTX-DT	Bryan, TX	59	DTV	CP	BPCDT-19991026ACP

STATIONS CONSIDERED IN STUDIES

No interfering stations require consideration in these studies

STUDY RESULTS

	POPULATION	AREA (sq km)
within Noise Limited Contour	2217132	37317.1
not affected by terrain losses	2216293	37173.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0
DTV Service	2216293	37173.0

TABLE 4.2

OET 69 INTERFERENCE STUDIES
 KBTX-DT - BRYAN, TX
(CHANNEL 33 RULEMAKING FACILITIES)
 Centex Television Limited Partnership
 Bryan, TX

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KBTX-DT	Bryan, TX	33	DTV	Rulemaking	BPRM-20000328ABS

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
KMSS-TV	Shreveport, LA	33	NTSC	CP	BMPCT-19990402KH
KITU	Beaumont, TX	34	NTSC	Licensed	BLET-19860724KF
KDAF	Dallas, TX	33	NTSC	CP	BPCT-19980909KF
KCTF	Waco, TX	34	NTSC	CP	BPET-19990216KF
KVUE-DT	Austin, TX	33	DTV	Allotment	
KITU-DT	Beaumont, TX	33	DTV	Allotment	
KTRK-DT	Houston, TX	32	DTV	Allotment	


STUDY RESULTS

	POPULATION	AREA (sq km)
within Noise Limited Contour	2527572	34748.0
not affected by terrain losses	2527391	34691.9
lost to NTSC IX	739	196.1
lost to additional IX by ATV	722030	2000.9
lost to ATV IX only	722301	2048.9
lost to all IX	<u>722769</u>	<u>2197.0</u>
DTV Service	1804622	32494.9

CERTIFICATE OF SERVICE

I, Karleen Lamie, a secretary in the law firm of Shaw Pittman, hereby certify that, on this 5th day of September, 2000, I caused to be served, by first class U.S. mail, postage prepaid a copy of the foregoing "**Comments of Centex Television Limited Partnership**" on the following:

Harry J. Barr
Pepper & Corazzini, LLP
1776 K Street, NW
Suite 200
Washington, D.C. 20006-2334


Karleen Lamie